

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, et al.,

Defendants.

No. 24-cv-10049 (LJL) (lead case)

WAYFARER STUDIOS LLC, et al.,

Plaintiffs,

v.

BLAKE LIVELY, et al.,

Defendants.

No. 25-cv-449 (LJL) (member case)

**NOTICE OF PLAINTIFF BLAKE LIVELY’S MOTION FOR SANCTIONS AGAINST
DEFENDANTS’ COUNSEL**

Plaintiff Blake Lively, by and through the undersigned counsel, hereby moves pursuant to New York Rule of Professional Conduct 3.6 (“N.Y. Rule 3.6”) and Federal Rule of Civil Procedure 16(f) for sanctions against Defendants’ counsel, Bryan Freedman. Ms. Lively respectfully submits that the Court should impose sanctions against Mr. Freedman as a consequence of his relentless media campaign to harm Ms. Lively’s character, credibility, and reputation.

For these reasons, and those set forth in more detail in the accompanying memorandum of law, the Court should impose sanctions on Mr. Freedman.

Respectfully submitted,

Dated: August 4, 2025

/s/ Michael J. Gottlieb

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